

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

60 WESTVIEW STREET, LEXINGTON, MASSACHUSETTS 62 1737 Fund Records Center

SEMS DocID

623390

MEMORANDUM

SUBJ: Request For Immediate Removal Action - ACTION MEMORANDUM

Megunco Road Site, Ashland, Massachusetts

Dean Tagliaferro, On-Scene Coordinator FROM:

Emergency Planning and Response Branch

TO: Michael R. Deland

Regional Administrator

Edward J. Conley, Director Thru:

Environmental Services Division

This is to retroactively confirm the verbal approval by the Regional Administrator on February 14, 1989, for \$97,000 to initiate a removal action at the Megunco Road Site in Ashland, Massachusetts. Implementation of this action will mitigate the damage to public health and to the environment by removing hazardous substances from pressure vessels and contaminated soil.

BACKGROUND

The Site is located on a vacant parcel of land approximately onequarter acre in size. The Site has been used as a dumping ground for old mixing tanks, pressure vessels, process tanks, and general debris. The Site is not fenced and access is presently unrestricted.

In December 1988 and January 1989, the Ashland Fire Department received numerous complaints from nearby residents of a highly irritating sulfur-like odor. Upon determining that the odor was not caused by a natural gas leak, the Fire Department requested assistance from the US EPA's Emergency Planning and Response Branch. Upon investigating the Site, a majority of the tanks and vessels were found to be empty or containing rain water. However, three pressure vessels/reactor tanks were found to be intact, but in deteriorated condition, and were located at the apparent source of the odor. A sample obtained from one of the vessels/tanks contained the following levels of hazardous substances:

Dimethyl Sulfide 2-Butanone (MEK)		210	ppm
4-Methyl-2-Pentanone 2-Hexanone Benzene	(MIBK)	4.4	ppm ppm
Toluene	,		ppm

Surface soil samples taken also indicate the presence of some of these same hazardous substances.

The Site is not on the National Priorities List (NPL).

THREAT

The threat is both the release of hazardous substances into the air and the threat of a fire/explosion. The flash point for dimethyl sulfide is -36 °F. An air release would be harmful because the Site does not have restricted access and is located near a residential area. The vessels/tanks are in poor condition and may rupture or leak at any time. There is an additional threat due to the presence of hazardous substances at the surface of the soil.

ENFORCEMENT (See attached)

PROPOSED ACTIONS

The removal shall consist of safely transferring all contents from the three tanks/vessels into 55-gallon drums. Contaminated soil underneath these tanks will also be excavated and placed into 55-gallon drums. These drums will then be sent to a disposal facility in RCRA compliance for incineration.

Due to the dimethyl sulfide having an odor threshold of 1 ppb, and the odor being highly irritating, a temporary structure will be constructed to contain any vapors which will be released during the operation.

Since all removal activities include off-site incineration, this removal action will be consistent with any long term actions.

PROPOSED COSTS

EXTRAMURAL COSTS

Clean-up Contractor (ERCS) Technical Assistance Team (TAT) 15% Extramural Contingency	\$50,000 7,500 <u>8,500</u>
Total Extramural Costs	\$66,000
INTRAMURAL COSTS	•
Direct Labor Indirect Costs	\$ 6,000 12,000
Total Intramural Costs	\$18,000
Subtotal Project Costs 15% Project Contingency TOTAL PROJECT CEILING ESTIMATE	\$84,000 <u>13,000</u> \$97,000

RECOMMENDATION

Because conditions at the Megunco Road Site in Ashland, Massachusetts meet the criteria set forth in the National Contingency Plan, Section 300.65, for a Removal Action as follows:

"Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release;" [300.65 (b)(2)(iii)], and

"High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate;" [300.65 (b)(2)(iv)],

I recommend your confirmation of your verbal approval of this removal action. The estimated total project costs are \$97,000 of which approximately \$50,000 are for extramural cleanup contractor costs. You may confirm your approval or disapproval by signing below.

Approval: //// Le	Date: 2/21/80
Disapproval:	Date: